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**UNITED STATES DISTRICT COURT**

**DISTRICT OF OREGON**

**PORTLAND DIVISION**

PORTLAND COMMUNITY COLLEGE,

Plaintiff,

v.

UNITED STATES DEPARTMENT OF  
VETERANS AFFAIRS., et. al.,

Defendants.

Case No. 3:21-cv-01658-AR

**JOINT STATUS REPORT**

Pursuant to the Court's Order entered on September 17, 2024 (ECF 82), counsel for plaintiff Portland Community College ("PCC") and for defendants United States Department of Veterans Affairs and Denis McDonough (collectively, the "VA") (together, the "Parties") have conferred and submit the following joint status report.

Since the Parties' last Joint Status Report (ECF 81), the Parties' counsel has continued to meet and confer to discuss the settlement of the claims. To facilitate discussions, on November 7,

2024, the VA provided information regarding its allocation of the alleged debts. PCC is in the process of examining that information in order to re-evaluate its settlement position.

Accordingly, to conserve judicial resources and allow the Parties time to continue settlement discussions without spending time and resources litigating this case further, the Parties ask the Court to hold PCC's Motion to Compel Supplemental Production of the VA's Administrative Record (ECF 72) and the VA's Motion for Judgment on the Pleadings (ECF 58) in abeyance for 60 days, and order the Parties to submit another Joint Status Report on or before January 17, 2025.

Respectfully submitted this 18th day of November 2024.

MILLER NASH LLP

NATALIE K. WIGHT  
United States Attorney  
District of Oregon

/s/ Stacey A. Martinson  
STACEY A. MARTINSON  
Of Attorneys for Plaintiff

/s/ Patrick J. Conti  
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